



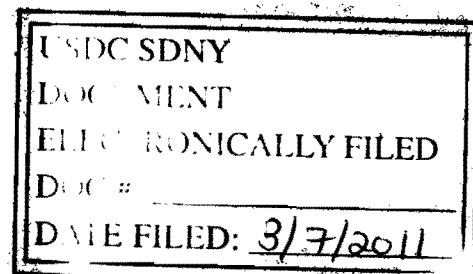
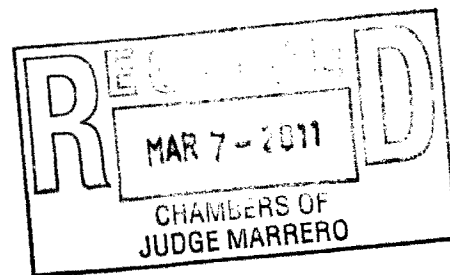
[jclark@jclarkassociates.com](mailto:jclark@jclarkassociates.com)  
Reply for MONTCLAIR

Via Facsimile

March 7, 2011

Hon. Victor Marrero, U.S.D.J.  
United States Courthouse  
Chambers Suite 660  
500 Pearl St.  
New York, NY 10007-1312

Re: The Louis Berger Group, Inc. v. State Bank of India  
Docket No.: 1:11-CV-00410-VN



Dear Judge Marrero:

This office represents plaintiff, The Louis Berger Group, Inc. ("LBG"), in the above referenced action. On February 28, 2011, Your Honor entered an Order that required the parties to confer and to submit a proposed briefing schedule regarding: (1) whether PCL should be permitted to intervene in this matter, and (2) whether this matter should be stayed pending final resolution of (a) a pending proceeding in the City Civil Court of Hyderabad, India involving PCL, LBG and SBI-NY and/or (b) an arbitration proceeding in New Jersey involving PCL and LBG.

The parties have conferred and submit the following proposed schedule:

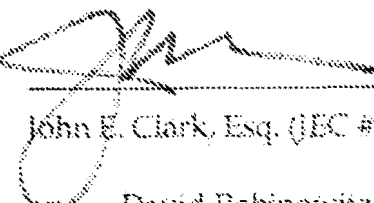
- (1) March 18, 2100 - Supporting papers in support of the Motion to Intervene and for a Stay shall be submitted.
- (2) April 1, 2011 - Opposition and/or Cross-Motions, if any, shall be filed.
- (3) April 15, 2011 - Replies, if any, shall be filed.

LBG has indicated that it may file a cross-motion for summary judgment. PCL has indicated that it objects to the filing of a cross-motion for summary judgment by LBG, believing that such a motion is premature not yet contemplated by the Court. In the event that the Court allows LBG to proceed with a summary judgment motion at this time, PCL will require additional time to answer such a motion. The proposed Scheduling Order does not address deadlines for briefing such a motion.

Hon. Victor Marrero  
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A proposed Scheduling Order is enclosed.

Respectfully submitted,



John E. Clark, Esq. (JEC #8138)

cc: David Rabinowitz, Esq. (via email)  
Michael E. Avidon, Esq. (via email)  
Gregory A. Horowitz, Esq. (via email)  
Andrew Anselmi, Esq.

Request GRANTED. The briefing schedule with regard to the motion <u>for intervention and the stay</u> herein is extended as set forth herein: motion papers submitted by <u>3-18-11</u> ; response <u>4-1-11</u> ; reply <u>4-15-11</u> . The court considers any motion for summary judgment premature at this time. <b>SO ORDERED.</b> <u>Upon consideration of any motions filed the court could convert it to one for summary judgment if appropriate.</u>	
DATE <u>3-7-11</u>	VICTOR MARRERO, U.S.D.J.